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| NUCHER, D.W.            |                         |  |
| IS, J.G.                |                         |  |
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| RED, J.E.<br>RERA, D.W. | <del>.</del>            | <del>                                     </del> |
| HERA, D.W.              | X_                      | <b>-</b>   |
| RERA, K. P.             | <u></u>                 | <u> </u>   |
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| 3E, J.J.                | -                       | <b>-</b>   |
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HORIZED CLASSIFIER

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REPLY TO LTR NO.

EGRG ROCKY FLATS

EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000



000029108

February 28, 1991

91-RF-1061

Robert N. Nelson, Jr. Manager DOE, RFO

NPDES STORM WATER PERMIT

Attn: D. P. Simonson

In response to your request of January 31, 1991 regarding the impact of recently finalized National Pollutant Discharge Elimination System (NPDES) Stormwater Permit regulations, we are providing an assessment of the regulatory impact and an implementation plan to comply with the application requirements.

Rocky Flats Plant will be subject to the stormwater permit requirements as a site with industrial activity. Under the provisions of the regulations, a permit application is due November 18, 1991. The application package must include information describing the site, stormwater analyses (one storm event per outfall) and storm event data, and certification that the conveyance system does not carry non-storm water. EG&G has initiated a number of activities related to completing the application in a timely manner for DOE review and subsequent submission to the Environmental Protection Agency (EPA). EPA recently sponsored a one day workshop to discuss the impact of the stormwater regulations on industrial facilities; this workshop was attended by EG&G personnel. Following application submittal, EPA will incorporate stormwater pollutant control provisions in existing NPDES permits. It is anticipated that the RFP NPDES permit will be renewed by the time the stormwater application is reviewed, requiring a stormwater supplement to the new permit. At this time, EPA anticipates using Best Management Practices (BMPs) for pollutant control in stormwater runoff. The application package will contain RFP BMPs for controlling pollutants in stormwater runoff.

EG&G has initiated application preparation through a review of in-house information applicable to this project, interviews with contractors to supply supplemental information, and coordinating on-site activities to procure all necessary information by the application deadline. A review of required parameters is underway to identify analytes which may be present in stormwater samples. In addition, stormwater sampling equipment is in place as part of the Zero-Offsite Water-Discharge Study (Tasks 2 & 3), and will be available during the 1991 "rainy" season. The requirement to sample one storm event per outfall will, therefore, be met.

If you have questions, please feel free to contact me or have your staff contact Bob Fielweg of my staff at 6632.

M. Kersh, Associate General Manager

**Environmental Restoration and Waste Management** 

BF:fm

Orig. and 1 cc - R. M. Nelson, Jr

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